

September 20, 2010

Mrs. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RE: Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Connect America Fund, WC Docket No. 10-90; High-Cost Universal Service Support, WC Docket No. 05-337; A National Broadband Plan for Our Future, GN Docket No. 09-51.**

Dear Ms. Dortch:

On September 17, 2010, David Erickson, Joshua Lowenthal, and the undersigned of Free Conferencing Corporation, Megan Delany of Delany Advisory Group, LLC, and Mary Diamond Stirewalt of Mary Diamond Strategies, LLC met with Geoffrey Blackwell, Chief of the Office of Native Affairs and Policy, and Daniel Rumelt, Senior Outreach Advisor in the Consumer & Governmental Affairs Bureau, to discuss issues related to the above-referenced dockets.

In the meeting, we discussed universal service fund reform efforts and efforts to deploy broadband to American Indian reservations. We noted that the Native American Telecom business model seems to reduce universal service fund costs in remote areas, and that free conferencing services have enabled Native American tribes to finance their own infrastructure build-out and Internet libraries, and provide telecommunications and broadband services to all the Reservation residents. We also discussed the need to eliminate current abuses occurring within the existing inter-carrier compensation regime while preserving the pro-consumer and pro-competitive benefits of services such as free conferencing services. In addition, we discussed the unlawful behavior occurring in today's marketplace by carriers who employ "self-help" tactics by simply refusing to pay charges owed. Finally, we discussed working to develop potential solutions that would achieve our shared goals of curtailing real abuses without eliminating valuable services and applications, including free conferencing services.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Jeff Holoubek

Jeff Holoubek  
Director of Legal & Finance  
Free Conferencing Corp.

cc: Geoffrey Blackwell  
Daniel Rumelt